

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES  
AND ERISA LITIGATION

This Document Applies To: : No. 09-MD-2017 (LAK)

*Washington State Investment Board v. Fuld, et al.*, :  
No. 09-cv-6041-LAK

**DEFENDANT UNICREDIT CAPITAL MARKETS INC'S OPPOSITION TO  
PLAINTIFF WASHINGTON STATE INVESTMENT BOARD'S MOTION TO DEPOSE  
BANK DEFENDANTS UNDER FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

Defendant UniCredit Capital Markets, Inc. f/k/a HVB Capital Markets, Inc. (“UniCredit”), a defendant in the above individual action, hereby opposes the motion by plaintiff Washington State Investment Board (“WSIB”) to depose a UniCredit representative under Federal Rule of Civil Procedure 30(b)(6) (Dkt. # 1229 in 09-md-2017), and joins in the arguments and authorities cited in the Bank Defendants’ Opposition<sup>1</sup> dated June 17, 2013. (Dkt. #1232 in 09-md-2017).

---

<sup>1</sup> Bank Defendants’ Opposition to Plaintiffs CALPERS’, WSIB’s, and American National’s Motion to Depose Bank Defendants Pursuant to Federal Rule of Civil Procedure 30(b)(6)

Dated: New York, New York  
June 17, 2013

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

By: Michael A. Hanin  
Mark P. Ressler  
Michael A. Hanin

1633 Broadway  
New York, New York 10019  
(212) 506-1700  
*Attorneys for Defendant UniCredit  
Capital Markets, Inc.*